

February 28, 2001

Mr. Ronald Brown RCRA Enforcement Section (WST-3-1) U.S. EPA, Region 9 75 Hawthorne Street San Francisco, CA 94105

RE: GOLDEN BEAR OIL SPECIALTIES WARNING LETTER

Dear Mr. Brown:

I recently received the Warning Letter regarding your inspection of our facility on March 24, 2000. I was surprised to read in the Potential Violations section of your Report (under Response) that "No documentation of correction of this situation has been received to date."

I do not recall during our Closing Conference that we were to respond in writing to you when the deficiencies were corrected. Had this been the case, I would have responded to you in April, 2000. We have been in compliance since that time. I have submitted the following enclosures as documentation of our compliance.

- 1. Photographs of our Recycle Drum Area tray to show that fluids are draining properly.
- 2. Copies of our Weekly Empty Drum Recycle Area Inspection Report that include a question regarding free liquid in the Drum Tray.
- A copy of our revised Hazardous Waste Contingency Plan, which was revised in April, 2000. The Plan has been revised to include home addresses of our Primary and Secondary Emergency Coordinators.
- 4. A copy of Appendix A of the Plan. Appendix A lists the description, location and capabilities of the Spill Cleanup Supplies and Equipment.
- 5. A copy of Appendix B of the Plan. Appendix B lists the locations of all fire extinguishers in the refinery.
- 6. A copy of Appendix B1 of the Plan. Appendix B1 lists the location number, size and type (capability) of every fire extinguisher in the refinery.

If you have any questions related to our response, please contact me at (661) 393-7110.

Sincerely,

GOLDEN BEAR OIL SPECIALTIES

David G. Campbell

Manager,

Safety, Health & Environmental Affairs

Cc: G. Trzaska



from Golden Bear Specialties



From Golden Bearn Specialties

(TO BE COMPLETED WEEKLY)

		1/2 00 201
II.	EMPT	TY DRUMS NO DRUMS
	A.	Is Drum Tray free of liquid? Yes ☑ No □ (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes □ No □
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not,	drain drums/install bungs/provide labels and move to drum trailer.
•	*Empt	ty – all material capable of being poured is poured or drained from container.
		uda (las) 3-31.00
Insped	ctor's S	Date of Inspection

(TO BE COMPLETED WEEKLY)

II EMPTY DR	IIRAC

NO DRUMS

	EMPT	TY DRUMS	MO DUOLING
	A.	Is Drum Tray free of liquid? Yes	No □ (If "No" arrange to empty)
	B.	Are all drums empty* as defined below	? Yes □ No □
	C.	Are all bung covers in place? Yes □	No □
	D.	Are all drums labeled to show most rec	ent contents? Yes □ No □
	If the	answers to "B", "C" and "D" are "yes	s", move drums to drum trailer.
	If not	, drain drums/install bungs/provide la	bels and move to drum trailer.
	*Emp	ty – all material capable of being poured	is poured or drained from container.
		ale Lups	4-7-00
spe	ctor's S	Signature	Date of Inspection

(TO BE COMPLETED WEEKLY)

[].	EMPTY DRUMS			
	A.	Is Drum Tray free of liquid? Yes-I No (If "No" arrange to empty)		
	B.	Are all drums empty* as defined below? Yes \(\text{No} \) \(\text{No} \) \(\text{D} \(\text{C} \) \(\text{D} \(\text{C} \)		
	C.	Are all bung covers in place? Yes □ No □		
	D.	Are all drums labeled to show most recent contents? Yes □ No □		
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.		
	If not	, drain drums/install bungs/provide labels and move to drum trailer.		
	*Emp	ty – all material capable of being poured is poured or drained from container.		

(TO BE COMPLETED WEEKLY)

FMPTY		
ア 4 4 7 1 7 1 7	1101	INA

l.	EMPT	Y DRUMS
	Α.	Is Drum Tray free of liquid? Yes No (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes No
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not,	drain drums/install bungs/provide labels and move to drum trailer.
(*Empt	y – all material capable of being poured is poured or drained from container. 4/21/00
Inspe	ctor's S	ignature Date of Inspection

(TO BE COMPLETED WEEKLY)

		TO BE COMMERCED WEEKEN
i.	EMP	TY DRUMS NO DRUMS
	A.	Is Drum Tray free of liquid? Yes ☑ No □ (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes □ No □
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not	t, drain drums/install bungs/provide labels and move to drum trailer.
	*Emp	oty – all material capable of being poured is poured or drained from container.
	4	-25-00 (Lule X hugs
nsne	ctor's	Signature Date of Inspection

(TO BE COMPLETED WEEKLY)

		(TO BE COMPLETED WEEKLT)
11.	EMPT	TY DRUMS NO DRUMS
	A.	Is Drum Tray free of liquid? Yes ☑ No □ (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes □ No □
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	if not,	, drain drums/install bungs/provide labels and move to drum trailer.
	*Empt	ty – all material capable of being poured is poured or drained from container.
		1. do 1/1.00 5-5-00
Inspec	ctor's S	Signature Date of Inspection

(TO BE COMPLETED WEEKLY)

DRAINING

ı	I.	F١	VI	P	ГΥ	ח	R	H	М	S

•		TT DRUMS
	A.	Is Drum Tray free of liquid? Yes No 🗆 (If "No" arrange to empty
	B.	Are all drums empty* as defined below? Yes □ No 🗹
	C.	Are all bung covers in place? Yes No No
	D.	Are all drums labeled to show most recent contents? Yes No □
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If no	t, drain drums/install bungs/provide labels and move to drum trailer.
	*Emr	sty all material capable of being poured is poured or drained from container

Inspector's Signature

Date of Inspection

		(TO BE COMPLETED WEEKLY)
	EMP	TY DRUMS NO DRUMS
	A.	Is Drum Tray free of liquid? Yes ☑ No □ (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes □ No □
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not	t, drain drums/install bungs/provide labels and move to drum trailer.
	*Emp	oty – all material capable of being poured is poured or drained from container.
	(de	ule Lupp
nspe	ctor's S	Signature Date of Inspection

		(TO BE COMPLETED WEEKLY)
1.	EMPT	TY DRUMS DRAINING
	A.	Is Drum Tray free of liquid? Yes No 🗆 (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No
	C.	Are all bung covers in place? Yes No No
	D.	Are all drums labeled to show most recent contents? Yes No
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not	, drain drums/install bungs/provide labels and move to drum trailer.
	*Empt	ty – all material capable of being poured is poured or drained from container.
		lule Duff 5.26.00
Inspe	ctor's S	Signature / / Date of Inspection

(TO BE COMPLETED WEEKLY) NO DRUMS

١	1	F	ħ	A	D	T	/	n	D	1	11	VI	9

I.	EMPT	TY DRUMS	_					
	A.	Is Drum Tray free of liquid? Yes 🗗 No 🗆 (If "No" arrange to empty)						
	B.	Are all drums empty* as defined below? Yes □ No □						
	C.	Are all bung covers in place? Yes □ No □						
	D.	Are all drums labeled to show most recent contents? Yes □ No □						
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.						
	If not,	, drain drums/install bungs/provide labels and move to drum trailer.						
l	*Empty – all material capable of being poured is poured or drained from container.							
Insped	ctor's S	Signature Date of Inspection						

(TO BE COMPLETED WEEKLY)

1.	EMPT	TY DRUMS NO ORUM
	A.	Is Drum Tray free of liquid? Yes 🗹 No 🗆 (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes No
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not	, drain drums/install bungs/provide labels and move to drum trailer.
	*Emp	ty – all material capable of being poured is poured or drained from container.
		Jula 1/400 (0-9-0)
Insped	ctor's S	Signature Date of Inspection

(TO BE COMPLETED WEEKLY) NO NRUM-S

1	EMP	TVF	DI	1 N / C
I.	PIVIP	1 Y 1)KI	

l.	EMF	PTY DRUMS
	A.	Is Drum Tray free of liquid? Yes No 🗆 (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes No
	C.	Are all bung covers in place? Yes No
	D.	Are all drums labeled to show most recent contents? Yes No
	If the	e answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If no	ot, drain drums/install bungs/provide labels and move to drum trailer.
	*Em	pty – all material capable of being poured is poured or drained from container.
		/ / / / / / / / / / / / / / / / / / /

Date of Inspection

(TO BE COMPLETED WEEKLY) NO DRUMS

t	ΕN	nD'	ΓΥΙ	מח	111	21/
1.	C. 14	1	1 T I	יזע	. UI	พอ

I.	EMPT	Y DRUMS				
	A.	Is Drum Tray free of liquid? Yes 🖭 No 🗆 (If "No" arrange to empty)				
	B.	Are all drums empty* as defined below? Yes □ No □				
	C.	Are all bung covers in place? Yes □ No □				
	D.	Are all drums labeled to show most recent contents? Yes No				
If the answers to "B", "C" and "D" are "yes", move drums to drum trailer. If not, drain drums/install bungs/provide labels and move to drum trailer.						
						*Empty – all material capable of being poured is poured or drained from container.
Inspector's Signature Date of Inspection						
iiispec	101 5 3	Signature Date of Inspection				

(TO BE COMPLETED WEEKLY)

١.		TY DRUMS
	A.	Is Drum Tray free of liquid? Yes No D (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes No 🗆
	D.	Are all drums labeled to show most recent contents? Yes ☐ No ☐
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not	, drain drums/install bungs/provide labels and move to drum trailer.
	*Emp	ty – all material capable of being poured is poured or drained from container.
	1111	

í

ENVIRONMENTAL INSPECTION EMPTY DRUM RECYCLE ARE,

(TO BE COMPLETED WEEKLY)

I.	EMP	TY DRUMS
	A.	Is Drum Tray free of liquid? Yes No 🗆 (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes █ No □
	C.	Are all bung covers in place? Yes ⊅ No □
	D.	Are all drums labeled to show most recent contents? Yes ☑ No □
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not	, drain drums/install bungs/provide labels and move to drum trailer.
	*Emp	ty – all material capable of being poured is poured or drained from container.
		MX 7/7/00
Inspe	ctor's S	Date of Inspection

(TO BE COMPLETED WEEKLY)

NO DRUMS

•	 IPTY		
	 	1101	IRAC

I.	EMPT	TY DRUMS
	A.	Is Drum Tray free of liquid? Yes No (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes No
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not,	drain drums/install bungs/provide labels and move to drum trailer.
	*Empt	ty – all material capable of being poured is poured or drained from container.
		Aul Len 1-14-00
Inspec	tor's 8	Signature // Date of Inspection

(TO BE COMPLETED WEEKLY)

1.	FN	1PT	ΥΓ)RI	JMS
				,,,,	

	EMP	TY DRUMS
	A.	Is Drum Tray free of liquid? Yes I No I (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes No DRAINING
	C.	Are all bung covers in place? Yes □ No No
	D.	Are all drums labeled to show most recent contents? Yes ☑ No □
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not	, drain drums/install bungs/provide labels and move to drum trailer.
	*Emp	ty – all material capable of being poured is poured or drained from container.
		11de /hyp 7-21-00
nspe	ctor's	Date of Inspection

		(TO BE COMPLETED WEEKLY)	
I.	EMPT	TY DRUMS DRAINING	
	A.	Is Drum Tray free of liquid? Yes No 🗆 (If "No" arrange to empty)	
	B.	Are all drums empty* as defined below? Yes □ No □	
	C.	Are all bung covers in place? Yes No	
	D.	Are all drums labeled to show most recent contents? Yes ☑ No □	
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.	
If not, drain drums/install bungs/provide labels and move to drum traile			
	*Empt	ty all material capable of being poured is poured or drained from container.	
		hule Lind 7-28-00	
Insped	ctor's S	ignature // Date of Inspection	
Forwa	rd com	pleted Inspection Form to Refinery Environmental Supervisor.	

		(TO BE COMPLETED WEEKLY)
l.	EMPT	TY DRUMS (TO BE COMPLETED WEEKLY) WO DRUMS
	A.	Is Drum Tray free of liquid? Yes 🖭 No 🗆 (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes \(\bar{\pi} \) No \(\bar{\pi} \)
	if the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not,	, drain drums/install bungs/provide labels and move to drum trailer.
	*Empt	ty - all material capable of being poured is poured or drained from container.
		hale Lass 8.4.00
Inspe	ctor's S	Date of Inspection

(TO BE COMPLETED WEEKLY) NO DRUM-S

l.	EMPTY DRUMS					
	A.	Is Drum Tray free of liquid? Yes 🖭 No 🗆 (If "No" arrange to empty)				
	B.	Are all drums empty* as defined below? Yes □ No □				
	C.	Are all bung covers in place? Yes □ No □				
	D.	Are all drums labeled to show most recent contents? Yes □ No □				
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.				
	If not	t, drain drums/install bungs/provide labels and move to drum trailer.				
	*Emn	ty – all material capable of being poured is poured or drained from container				

8-11-00 Date of Inspection

	ı	FMPT	DD V	LIMIC
--	---	------	------	-------

		(TO BE COMPLETED WEEKLY) NO DRUMS
1.	EMP	TY DRUMS
	A.	Is Drum Tray free of liquid? Yes 🖭 No 🗆 (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes No
	D.	Are all drums labeled to show most recent contents? Yes No
	If the	e answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	lf no	t, drain drums/install bungs/provide labels and move to drum trailer.
	*Emj	pty – all material capable of being poured is poured or drained from container.
		2/2 / / / B-18-00

Date of Inspection

(TO BE COMPLETED WEEKLY)

DRUMS DRAINING

•			T\/ 1	~ D I	INAC
	<u> </u>	$\pi \cup$, v ,	101	ınn 👡

A.	Is Drum Tray free of liquid?	Yes 🗹	No □	(If "No" arrange to empty
----	------------------------------	-------	------	---------------------------

B. Are all drums empty* as defined below? Yes □ No 🗹

C. Are all bung covers in place? Yes ☑ No □

D. Are all drums labeled to show most recent contents? Yes □ No □

If the answers to "B", "C" and "D" are "yes", move drums to drum trailer.

If not, drain drums/install bungs/provide labels and move to drum trailer.

*Empty - all material capable of being poured is poured or drained from container.

Inspector's Signature Date of Inspection

(TO BE COMPLETED WEEKLY) NO DRUMS

1	FI	۱M	D)	ΓΥ	n	R	ш	M	2
ı	_	X1			u	1	u	м	•

1.	EMPTY DRUMS						
	A.	Is Drum Tray free of liquid? Yes No (If "No" arrange to empty)					
	B.	Are all drums empty* as defined below? Yes □ No □					
	C.	Are all bung covers in place? Yes □ No □					
	D.	Are all drums labeled to show most recent contents? Yes No					
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.					
If not, drain drums/install bungs/provide labels and move to drum trailer.							
*Empty – all material capable of being poured is poured or drained from container.							
(Leile V 11120 9-1-00							
Insped	ctor's S	Date of Inspection					

(TO BE COMPLETED WEEKLY)

DRAINING

DRAINING

II. **EMPTY DRUMS**

A.	Is Drum Tray free of liquid? Yes P No 🗆 (If "No" arrange to empty)				
B.	Are all drums empty* as defined below? Yes □ No No No No No No No No				
C.	Are all bung covers in place? Yes □ No 型				
D.	Are all drums labeled to show most recent contents? Yes ✓ No □				
If the answers to "B", "C" and "D" are "yes", move drums to drum trailer.					
If not, drain drums/install bungs/provide labels and move to drum trailer.					

*Empty – all material capable of being poured is poured or drained from container.

Forward completed Inspection Form to Refinery Environmental Supervisor.

î

(TO BE COMPLETED WEEKLY)

II.	EMP	PTY DRUMS NO DRUMS
	A.	Is Drum Tray free of liquid? Yes □ No □ (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes No
	If the	e answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If no	t, drain drums/install bungs/provide labels and move to drum trailer.
	*Em	pty – all material capable of being poured is poured or drained from container.
		Jule 1 hopo 9-15-00

Forward completed Inspection Form to Refinery Environmental Supervisor.

Date of Inspection

Inspector's Signature

(TO BE COMPLETED WEEKLY)

ı	М	\mathbf{p}	ſΥ	n	\mathbf{r}	1 1	R A	C
I.	VI	\mathbf{r}	1 T	IJ	П	u	IVI	J

EMPT	EMPTY DRUMS				
A.	Is Drum Tray free of liquid? Yes W No 🗆 (If "No" arrange to empty)				
B.	Are all drums empty* as defined below? Yes □ No □				
C.	Are all bung covers in place? Yes □ No □				
D.	Are all drums labeled to show most recent contents? Yes □ No □				
If the answers to "B", "C" and "D" are "yes", move drums to drum trailer.					
If not, drain drums/install bungs/provide labels and move to drum trailer.					
*Empty – all material capable of being poured is poured or drained from container.					
(),	9-22-00				

Inspector's Signature

Date of Inspection

(TO BE COMPLETED WEEKLY)

II.	EMP	TY DRUMS NO DRUMS
	A.	Is Drum Tray free of liquid? Yes No (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes □ No □
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If no	t, drain drums/install bungs/provide labels and move to drum trailer.
	*Emp	oty – all material capable of being poured is poured or drained from container.
/	(),	4-29-00
Inche	COT'S	Signature Date of Inspection

(TO BE COMPLETED WEEKLY)

i		F	N	1	P٦	Г١	/	n	R	1	Ħ	٧	IS	į
ł	-	_	IX			1		u	ı١		,,		ı	٠

1.	EMPT	Y DRUMS
	Α.	Is Drum Tray free of liquid? Yes 🖽 No 🗆 (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes 🗆 No 🗅
	D.	Are all drums labeled to show most recent contents? Yes □ No □
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not,	drain drums/install bungs/provide labels and move to drum trailer.
	*Empt	y – all material capable of being poured is poured or drained from container.
Inspe	ctor's S	Date of Inspection

(TO BE COMPLETED WEEKLY)

NO DRUMS

			-T	<i>,</i> D	\sim 1		
1	1.	⊢M	PT	Y D	ĸι	JM	5

il.	EMPT	'Y DRUMS
	A.	Is Drum Tray free of liquid? Yes No (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes \square No \square
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not,	drain drums/install bungs/provide labels and move to drum trailer.
	*Empt	ty – all material capable of being poured is poured or drained from container.
		ude Juso 10.13.00
Inspe	ctor's S	Date of Inspection

(TO BE COMPLETED WEEKLY)

RUMS

	1 YT¢	

l.	EMP.	TY DRUMS
	A.	Is Drum Tray free of liquid? Yes No (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes No
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not	, drain drums/install bungs/provide labels and move to drum trailer.
	*Emp	ty – all material capable of being poured is poured or drained from container.

Date of Inspection

(TO BE COMPLETED WEEKLY)

NO DRUM S

1	DDI	IRAC

EMP	TY DRUMS
A.	Is Drum Tray free of liquid? Yes a No 🗆 (If "No" arrange to empty)
B.	Are all drums empty* as defined below? Yes □ No □
C.	Are all bung covers in place? Yes □ No □
D.	Are all drums labeled to show most recent contents? Yes □ No □
If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
If not	, drain drums/install bungs/provide labels and move to drum trailer.
*Emp	ty – all material capable of being poured is poured or drained from container.

î

ENVIRONMENTAL INSPECTION EMPTY DRUM RECYCLE AREA

(TO BE COMPLETED WEEKLY)

		(TO BE COMPLETED WEEKLY)				
l.	EMP	TY DRUMS				
	A.	Is Drum Tray free of liquid? Yes ☑ No □ (If "No" arrange to empty)				
	B.	Are all drums empty* as defined below? Yes □ No □				
	C.	Are all bung covers in place? Yes □ No □				
	D.	Are all drums labeled to show most recent contents? Yes No				
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.				
	If not	t, drain drums/install bungs/provide labels and move to drum trailer.				
	*Empty—all material capable of being poured is poured or drained from container.					
		Mus Um 11-3-ce				
nspe	ctor's S	Signature Date of Inspection				

(TO BE COMPLETED WEEKLY)

		VIC DISONIS				
I.	EMPT	TY DRUMS				
	A.	Is Drum Tray free of liquid? Yes W No 🗆 (If "No" arrange to empty)				
	B.	Are all drums empty* as defined below? Yes □ No □				
	C.	Are all bung covers in place? Yes No				
	D.	Are all drums labeled to show most recent contents? Yes \(\Delta\) No \(\Omega\)				
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.				
	If not, drain drums/install bungs/provide labels and move to drum trailer.					
*Empty – all material capable of being poured is poured or drained from container.						
(16	(16 V /10-00) 11-10-00				
Insped	ctor's S	Signature / / / Date of Inspection				

(TO BE COMPLETED WEEKLY)

ı	l.	F٨	Л	PΤ	Υ	ח	RI	11	И	S
		-11	"	ГІ		$\boldsymbol{\smile}$	£ 🗸 I	J	ŦI	J

11.	EMPT	TY DRUMS		
	A.	Is Drum Tray free of liquid? Yes No (If "No" arrange to empty)		
	B.	Are all drums empty* as defined below? Yes □ No □		
	C.	Are all bung covers in place? Yes No-		
	D.	Are all drums labeled to show most recent contents? Yes ☑ No □		
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.		
	If not,	drain drums/install bungs/provide labels and move to drum trailer.		
	*Empty – all material capable of being poured is poured or drained from container.			
	14	11-17-ce		
Inspec	ctor's S	Date of Inspection		

(TO BE COMPLETED WEEKLY)

NO DRUMS

Ì	EMP ³	ry n	RH	N/S
_	I IVII		\mathbf{n}	1111

I.	EMPT	Y DRUMS		
	A.	Is Drum Tray free of liquid? Yes W No 🗆 (If "No" arrange to empty)		
	B.	Are all drums empty* as defined below? Yes □ No □		
	C.	Are all bung covers in place? Yes □ No □		
	D.	Are all drums labeled to show most recent contents? Yes □ No □		
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.		
	If not,	drain drums/install bungs/provide labels and move to drum trailer.		
	*Empty – all material capable of being poured is poured or drained from container.			
(/ / / / / / / / / / / / / / / / / / /				
Inspec	ctor's S	Date of Inspection		

(TO BE COMPLETED WEEKLY)

		100000000000000000000000000000000000000				
11.	EMPT	TY DRUMS NO DRUMS				
	A.	Is Drum Tray free of liquid? Yes ☑ No ☐ (If "No" arrange to empty)				
	B.	Are all drums empty* as defined below? Yes □ No □				
	C.	Are all bung covers in place? Yes □ No □				
	D.	Are all drums labeled to show most recent contents? Yes No				
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.				
	If not, drain drums/install bungs/provide labels and move to drum trailer.					
	*Empty – all material capable of being poured is poured or drained from container.					
		11le / haso 12-1-00				
Insped	ctor's S	Signature Date of Inspection				

Forward completed Inspection Form to Refinery Environmental Supervisor.

(TO BE COMPLETED WEEKLY)

il.	EMPT	TY DRUMS NO URUNIS			
	A.	Is Drum Tray free of liquid? Yes P No (If "No" arrange to empty)			
	B.	Are all drums empty* as defined below? Yes □ No □			
	C.	Are all bung covers in place? Yes □ No □			
	D.	Are all drums labeled to show most recent contents? Yes No			
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.			
	If not,	drain drums/install bungs/provide labels and move to drum trailer.			
*Empty – all material capable of being poured is poured or drained from container.					
	///	le Xleigh 12-8-00			
Inspe	tor's S	Date of Inspection			

Forward completed Inspection Form to Refinery Environmental Supervisor.

(TO BE COMPLETED WEEKLY)

NO DRUMS

	ŧ	EMPTY	DRUMS
--	---	-------	-------

EMP	TY DRUMS		
A.	Is Drum Tray free of liquid? Yes 🕑 No 🗆 (If "No" arrange to empty)		
B.	Are all drums empty* as defined below? Yes □ No □		
C.	Are all bung covers in place? Yes □ No □		
D.	Are all drums labeled to show most recent contents? Yes □ No □		
If the answers to "B", "C" and "D" are "yes", move drums to drum trailer.			
If not, drain drums/install bungs/provide labels and move to drum trailer.			
*Empty – all material capable of being poured is poured or drained from container.			

Forward completed Inspection Form to Refinery Environmental Supervisor.

(TO BE COMPLETED WEEKLY)

1	EMPT	יט עי	21 IN 11 C
1.		יוט ו	101410

l.	EMP'	TY DRUMS		
	A.	Is Drum Tray free of liquid? Yes 型 No □ (If "No" arrange to empty)		
	B.	Are all drums empty* as defined below? Yes □ No □		
	C.	Are all bung covers in place? Yes No		
	D.	Are all drums labeled to show most recent contents? Yes No		
	If the	e answers to "B", "C" and "D" are "yes", move drums to drum trailer.		
	If not	t, drain drums/install bungs/provide labels and move to drum trailer.		
*Empty – all material capable of being poured is poured or drained from container.				
	(Lu	(i'le \ /1120 12-22-00		
Inspe	ctor's	Signature Date of Inspection		

(TO BE COMPLETED WEEKLY) NO DRUMS

١.	Е	M	P.	TΥ	D	R	Uľ	VIS	;
							$\mathbf{-}$,

1.	EMPT	Y DRUMS
	A.	Is Drum Tray free of liquid? Yes W No 🗆 (If "No" arrange to empty)
	B.	Are all drums empty* as defined below? Yes □ No □
	C.	Are all bung covers in place? Yes □ No □
	D.	Are all drums labeled to show most recent contents? Yes No
	If the	answers to "B", "C" and "D" are "yes", move drums to drum trailer.
	If not,	drain drums/install bungs/provide labels and move to drum trailer.
	*Empt	y – all material capable of being poured is poured or drained from container.
,	(),	12-29-00
Inspec	tor's S	Signature Date of Inspection

GOLDEN BEAR OIL SPECIALTIES

OILDALE, CALIFORNIA

REFINERY & TANK FARM

HAZARDOUS WASTE CONTINGENCY PLAN

Hazardous Waste Manager: Environmental Manager - W. Rosica

Hazardous Waste Supervisor: Maintenance Supervisor - T. Boyd

Revised 04/00

TABLE OF CONTENTS

SECTION	TITLE'	PAGE
1.0	Introduction	3
2.0	Preparedness and Prevention Measures	3
2.1	Design and Operation of Hazardous Waste Management	
	Facilities	4
2.2	Required Equipment	5
2.3	Testing and Maintenance of Equipment	6
2.4	Arrangements with Local Authorities	6
3.0	Amendment of Contingency Plan	6
3.1	Emergency Coordination	7
3.2	Evacuation Plan	9
3.3	Emergency Procedures	9
Appendix A Appendix B Appendix C	Spill Cleanup Supplies Location Fire Extinguisher Locations & Capabilities Safety Shower/Face Bath Locations	

HAZARDOUS WASTE CONTINGENCY PLAN

1.0 INTRODUCTION

The purpose of this Contingency Plan is to minimize the potential for hazards to human health or the environment from any unplanned, sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water.

The plan is designed to help plant personnel to respond quickly and effectively to the problems presented by hazardous waste spills. Its primary goal is to limit, as far as practical, damage to human health, the environment and property from such a spill. The plan contains descriptions of the duties that are to be administered should a hazardous waste spill occur. It also references emergency procedures and notification procedures to be followed in the event of a hazardous waste spill.

California Code of regulations (CCR) Title 22, Section 66264.52, states that if the owner or operator of a hazardous waste generating facility has already prepared a Spill Prevention Control and Countermeasures (SPCC) Plan in accordance with applicable federal regulations, that plan need only be amended to incorporate hazardous waste management provisions that are sufficient to comply with CCR Chapter 30, titled "Minimum Standards for Management of Hazardous and Extremely Hazardous Wastes". This location has prepared a SPCC Plan and an Emergency Action Plan. Much of the following information has been taken from these existing Plans.

2.0 PREPAREDNESS AND PREVENTION MEASURES

As required by the California Code of Regulations (CCR), Title 22, Section 66264.31, this plan covers preparedness and prevention measures that have been or will be implemented at the refinery and Tank Farm to minimize the possibility of any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents (hereafter referred to as a hazardous waste spill) to air, soil, surface water or ground water that could threaten human health or the environment.

The best way to handle hazardous waste spills is to prevent their occurrence. Adequate equipment maintenance and adherence to proper operation procedures are the best insurance against hazardous waste spills. All personnel at the refinery and tank farm are responsible for following good work practices to assure that a hazardous waste spill event does not occur. If, in spite of refinery personnel's best care and efforts, accidental spills do occur, they will be remedied immediately.

2.1 DESIGN AND OPERATION OF HAZARDOUS WASTE MANAGEMENT FACILITIES

The refinery drum storage area, used to accumulate hazardous waste in drums, consists of a concrete pad with curbs and a grated concrete trench. The concrete trench will contain any spills or drainage from drums.

Contaminated soils and asphalt tank bottoms generated are stored in a containment area at the southeast corner of the refinery.

The refinery has a segregated locked building for up to 90-day storage of asbestos and lab packs.

Two covered/lined dumpsters are used for collection of oily debris. One is located north of the Lab and one is located at the Tank Farm.

A forty-seven barrel bulk liquid tank (L-47) is maintained outside the laboratory for storage of liquid hazardous wastes, which will be sent to a fuels recovery program for recycling. This tank is adequately diked.

A small tank located on the West Side of the automotive garage is used for storing used crankcase oil prior to shipment to a recycler. This tank is adequately diked. At the same location is a 55-gallon drum used for storing used oil filters.

A 55-gallon drum of used antifreeze is stored as a satellite accumulation at the Automotive Garage. This waste can be accumulated for up to one year after the date that used antifreeze is first put into the drum.

Small containers of used chemicals are maintained in the laboratory. These containers are labeled "Hazardous Waste" and are emptied daily into Tank L - 47.

All of the areas listed above are inspected weekly, with the exception of L-47, which is inspected daily. Documentation of inspections is kept for three (3) years.

All hazardous wastes are accumulated for no more than ninety (90) days, except as noted above.

The following wastes may be routinely generated:

WASTE

STORAGE LOCATION

Asphalt Tank Bottoms (NonHaz) Corner of Laboratory Lane and Co-Gen Avenue Exchanger Cleaning Sludge Asbestos Insulation/Lab Packs Lab Wastes Used Crankcase Oil & Oil Filters Used Antifreeze Carbon Beds Oily Debris

Corner of Laboratory Lane and Shippers Hwy. Corner of Maintenance Avenue & Main Street Tank #L-47 on North side of Laboratory Corner of Laboratory Ln. & Maintenance Avenue Southwest Corner of Automotive Garage Corner of Polymer Road and Weinberg Place Corner of Laboratory Ct. and Maintenance Ave. and Tank Farm Location

Oily Soil (NonHaz) Filter Press Sludge (Non Haz) Corner of Laboratory Lane and Co-Gen Avenue

Waste Water Treatment Plant

Adequate space is maintained around all storage areas to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment.

The refinery and tank farm location peripheries are fenced with a six to eight-foot chain link, barbed wire-topped fence. Contract security personnel maintain security 24-hours per day.

The refinery area north of the Beardsley canal is not located in the 100-year flood plain.

2.2 REQUIRED EQUIPMENT

A description of the refinery's internal communication and alarm system capable of providing emergency instruction to facility personnel is provided in Section II of the Emergency Action Plan.

As described in Sections II and III of the Emergency Action plan, all internal communications regarding hazardous waste emergencies will be by two-way radio or by telephone to the Shift Supervisor, who will then summon additional emergency assistance as required. Refinery operators, supervisors, fire response team members and maintenance personnel carry two-way radios. Other personnel involved with hazardous waste management notify the Shift Supervisor by telephone or in person in the event of an emergency.

Appendix E of the Emergency Action Plan is a Refinery Plot Plan that indicates the location and a description of fire protection equipment. Appendix F of the Emergency Action Plan is a list of the Emergency Response Team personnel, their title and their function in the event of a fire.

2.3 TESTING AND MAINTENANCE OF EQUIPMENT

All refinery fire protection equipment and spill control equipment are inspected and maintained using the Safety Inspection Checklist and the Monthly Fire Prevention Inspection. Line supervisors are responsible for these monthly inspections. Internal communications equipment (two-way radios) is used on a daily basis and therefore does not require testing. They are maintained regularly, as required.

2.4 ARRANGEMENT WITH LOCAL AUTHORITIES

The refinery has made arrangements for outside assistance to be provided in the event of an emergency. Arrangements have been made to familiarize the Fire Department with hazardous waste management procedures, by providing them with a copy of the Refinery Business Plan. No state or local authorities have ever declined to enter into such an arrangement. In addition, the refinery routinely provides local authorities with tours of the facility to familiarize them with the refinery operations and layout.

3.0 AMENDMENT OF CONTINGENCY PLANS

A current copy of this plan will be maintained at the Oildale refinery. As required by CCR Section 22-66264.54, this contingency plan will be reviewed and amended whenever:

- The Facility Permit is revised;
- The existing plan fails in an emergency;
- The hazardous waste storage areas change in design, construction, operation, maintenance or any other circumstance that could substantially increase the potential for fires, explosions or releases of hazardous wastes;
- The emergency coordination list changes; or
- The emergency equipment list changes.

The Environmental Supervisor will complete a review and evaluation of the Contingency Plan at least once every three years if none of the situations listed above occur.

3.1 EMERGENCY COORDINATION

At all times there will be at least one employee on the facility premises with the responsibility of coordinating all emergency response measures. This person will be known as the Emergency Coordinator (EC). The EC will be thoroughly familiar with all aspects of this Hazardous Waste Contingency Plan and all refinery operations involving hazardous waste management. This person will have the authority to commit the resources necessary to carry out the Hazardous Waste Contingency Plan.

The Emergency Coordinators are:

TITLE	NAME	PHONE NUMBERS
Hazardous Waste Manager (Primary)	Bill Rosica 14006 Westdale Drive, Bakersfield	Ext. 287 (Office) 589-4983 (Home)
Hazardous Waste Supervisor (Secondary)	Tom Boyd 2116 Bedford Way, Bakersfield	Ext. 320 (Office) 399-9765 (Home)

Other Hazardous Waste Management Emergency Coordinators are:

SHIFT SUPERVISORS (Extension 260/261) Home addresses are not needed because at least one Shift Supervisor is on the job at the Refinery at all times.

Dan Martin	834-2306	Gary Grunsky	831-7193
Ron Sullivan	589-2347	John McDonald	588-8985
Alfonso Diaz	327-5334		

In the unlikely event that an emergency involving hazardous waste could threaten human health and the environment outside the Refinery or Tank Farm, the following agencies would be notified, as appropriate. As a minimum the State Office of Emergency Services (OES) and the CAL/EPA must be notified.

AGENCY	PHONE NUMBER
Kern County Fire Department	911
California Office of Emergency Services	800-852-7550
California EPA (Dept. Of Toxic Substances Control)	800-618-6942
Kern County Environmental Health	661-862-8700
California Regional Water Quality Control Board (Releases to water)	559-445-5116
San Joaquin Valley Unified Air Pollution Control District (Releases to Air)	661-862-5200

National Response Center	800-424-8802
Environmental Protection Agency - Emergency Response	800-424-9346
Kern County Health Department	661-861-3636

The above agencies would be provided with the following information:

- Name and telephone number of person reporting incident
- Name and address of the refinery or tank farm
- Time and type of incident
- Known name and quantity of hazardous waste(s) involved
- Extent of any known injuries
- Potential hazards to human health and the environment beyond boundary limits of the refinery

SPILL CLEANUP CONTRACTORS

Calpi, Inc. (Containment/Clean-Up)	661-589-5648
M.P. Environmental Services (Containment/Clean-Up)	661-393-1151

3.2 EVACUATION PLAN (See Appendix I - Emergency Action Plan)

All three of the emergency evacuation routes are primary. Any one of the three routes can be used an alternate if the primary route is blocked.

3.3 EMERGENCY PROCEDURES

In the event of a hazardous waste spill or emergency, any employee discovering that a problem has occurred, or is occurring, has two initial responsibilities:

- 1. Stop the spill, if possible to do so safely. (E.g., a leaking container place absorbent material or device around container)
- 2. Immediately notify the Shift Supervisor

The Shift Supervisor will immediately notify the following personnel:

PERSON TO BE NOTIFIED	NAME/PHONE	RESPONSIBILITIES
Emergency Coordinator	Bill Rosica/589-4983 Tom Boyd/399-9765	Identifies the character, source, amount and extent of any hazardous waste released
Refinery Manager	Merle Menghini 327-8824	Coordinates and directs emergency efforts.
Manager of Operations	Ed Stratton 871-6938	Assists Refinery Manager, or directs in his absence.
Maintenance Manager	Bud Wyant 664-1715	Effects mechanical repairs.
Hazardous Waste Manager	Bill Rosica 589-4983	Coordinates hazardous waste emergencies. Notifies regulatory agencies.
Hazardous Waste Supervisor	Tom Boyd 399-9765	Directs cleanup crew.
Manager, Safety, Health & Environmental Affairs	David Campbell 665-2044	Assists Refinery Manager and Hazardous Waste Manager

The Refinery Manager, or his alternate, will immediately make a judgment as to the severity of the spill. If the spill is major, the Emergency Action Plan shall be activated.

During an emergency, the Emergency Coordinator will be responsible for directing containment and cleanup of any hazardous waste released, and for preventing any adverse impact to the public and the environment.

During an emergency, the emergency coordinator will make every reasonable effort to ensure that further releases do not occur, recur or spread to other hazardous wastes. Measures to be taken include, but are not limited to:

- Activating facility communication systems to notify all facility personnel.
- Stopping all operations in the hazardous waste storage areas, if necessary.
- Collecting and containing released hazardous wastes.
- Removing or isolating containers of hazardous waste.

All hazardous waste storage area operations such as loading/unloading, transporting and drumming must be discontinued during an emergency and may be left unattended in a safe manner if at all possible.

The Hazardous Waste Supervisor will be responsible for supervision of cleanup activities.

The Maintenance Manager will arrange for equipment repair.

Sufficient supplies and equipment to contain and cleanup any reasonably conceivable hazardous waste spills are stationed at the plant and are ready for immediate use. Attachment 1 of this plan indicates the location of all spill cleanup supplies. However, if additional aid, equipment or supplies are required, commercial vacuum truck and spill cleanup companies are available.

The Hazardous Waste Manager is responsible for determining that the emergency is over and will provide for:

- Storage or disposal of recovered hazardous wastes;
- Storage or disposal of contaminated soils or surface water;
- Ensuring that no waste which is incompatible with the released material is stored or disposed of until cleanup procedures are completed;
- Ensuring that all emergency equipment is thoroughly decontaminated and fit for its intended use.

Upon completion of these duties, the Hazardous Waste Manager must notify those state authorities originally contacted that the affected area is in compliance.

A record of the emergency will become part of the operating records and should include, but not be limited to:

- Date of incident
- Time of incident
- Details of incident, which required initiating the Contingency Plan.

Within fifteen (15) days after the emergency, the State OES and the State Department of Toxic Substance Control will be provided a written report of the incident to include:

- Name, address and telephone number of the owner or operator.
- Name, address and telephone number of the facility.
- Date, time and type of incident.
- Extent of any injuries.
- Assessment of actual or potential hazards to human, health or the environment.
- Estimated quantity and disposition of recovered material.

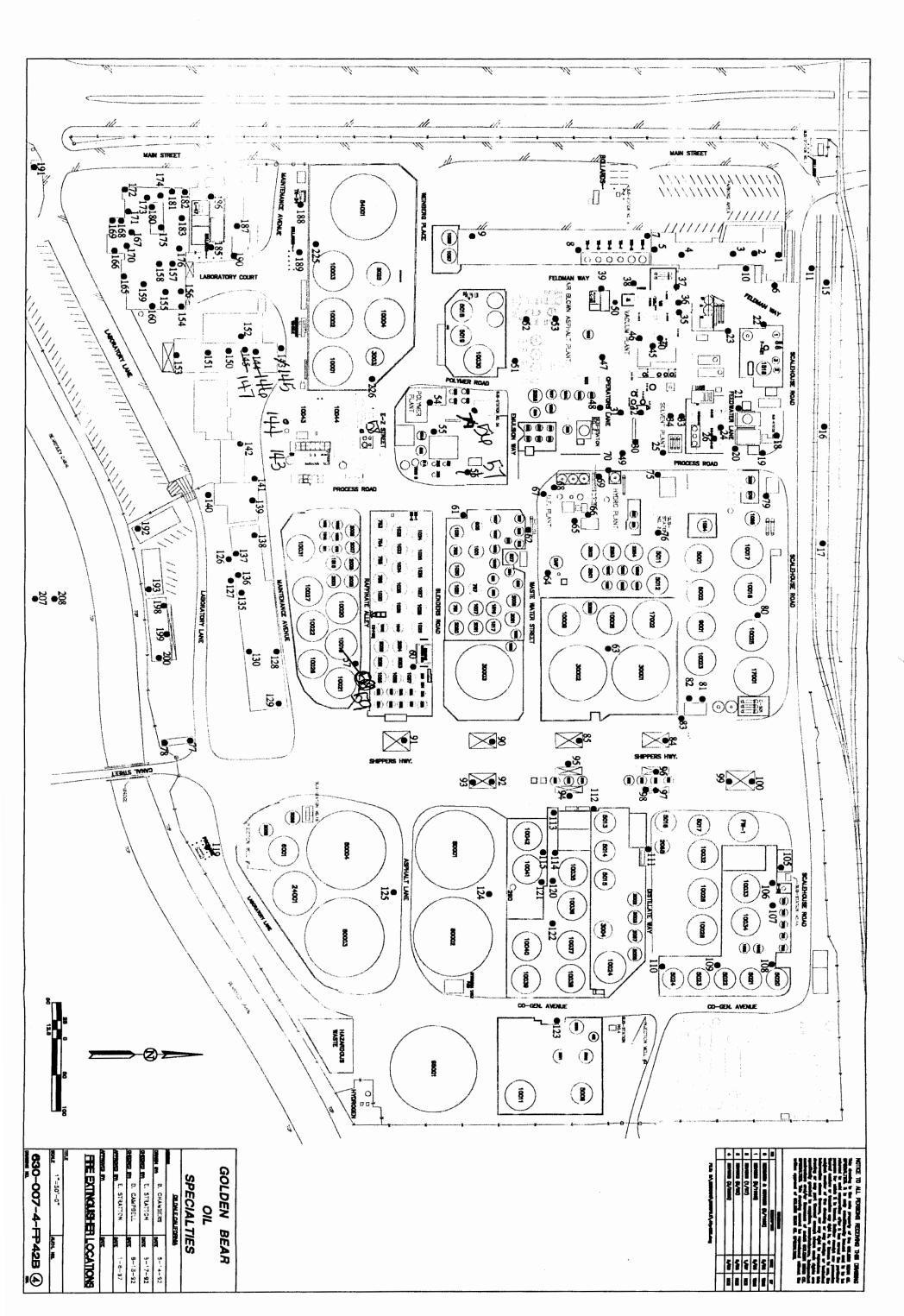
APPENDIX A

SPILL CLEANUP SUPPLIES AND EQUIPMENT

DESCRIPTION	LOCATION	CAPABILITIES
Rock Dust	Southeast Corner of Refinery	Oil Absorbent
Shovels, Rakes, Etc.	Yard Crew Shop	Distribute Absorbent
Waste Drums	Storage Shed North of Lab	For storing wastes
Small Quantity Acid Base and Neutralization Chemicals	Quality Control Lab	For neutralizing acids and bases
Mercury Spill Kit	Quality Control Lab	For mercury cleanup
Rolled Absorbent	Insulation Shed	Oil/Chemical Absorbent
Vacuum Truck	Maintenance	Liquid Spills
Backhoe	Maintenance	Distribute Absorbent

DECONTAMINATION EQUIPMENT

DESCRIPTION	LOCATION	CAPABILITIES
Steam/Hot Water	Exchanger Cleaning Pad	Degreasing



LOCATION	SIZE	TYPE
1	10#	ABC DCP
2	5#	HA
3	10#	ABC
4	10#	ABC
5	5#	ABC
6	20#	ABC
7	25#	ABC DCC
8	10#	ABC
9	18#	ABC
10	125#	PK DCC
11	17#	ABC DCC
15	18#	ABC
16	18#	ABC
17	18#	ABC
18	20#	CO2
19	18#	ABC
20	18#	ABC
21	17#	ABC DCC
22	20#	ABC
23	20#	ABC
24	18#	PK DCC
25	18#	ABC
26	20#	ABC
30	20#	ABC
31	20#	ABC
32	18#	ABC
33	20#	ABC
34	18#	ABC
35	150#	ABC DCC
36	18#	ABC
37	18#	ABC
38	17#	ABC DCP
39	18#	ABC
40	18#	ABC
45	18#	ABC
46	18#	ABC
47	20#	ABC
48	18	ABC DCP
49	18#	ABC
50	20#	ABC
51	20#	ABC
52	20#	ABC
53	20#	ABC

LOCATION	SIZE	TYPE
54	20#	ABC
55	18#	ABC
56	18#	ABC
57	20#	ВС
60	27#	PK DCC
61	20#	ABC
62	20#	ABC
63	20#	ABC
64	18#	ABC
65	18#	ABC
66	20#	ABC
67	18#	PK DCC
68	150#	ABC DCC
69	18#	PK DCC
70	18#	ABC
75	20#	ABC
76	20#	ABC
79	25#	ABC DCC
80	125#	PK DCC
81	20#	ABC
82	20#	ABC
83	18#	ABC
84	18#	ABC
85	20#	BC
90	18#	ABC
91	17#	ABC DCC
92	20#	ABC
93	20#	ABC
94	18#	ABC
95	18#	ABC
96	18#	ABC DCP
97	26#	ABC DCC
98	25#	ABC DCC
99	25#	ABC DCC
100	5#	HALON
105	27#	PKP DCC
106	27#	PKP DCC
107	27#	PKP DCC
108	27#	PKP DCC
109	27#	PKP DCC
110	20#	ABC
111	25#	ABC
	18#	ABC
112	10#	MDC

LOCATION	SIZE	TYPE
113	25#	ABC DCC
114	17#	ABC DCC
115	25#	ABC DCC
119	17#	ABC DCC
120	25#	ABC DCC
121	25#	ABC DCC
122	18#	ABC
123	20#	ABC
124	20#	BC
125	26#	ABC DCC
126	18#	PK DCC
127	10#	ABC
128	10#	ABC
129	10#	ABC
130	20#	ABC
135	20#	CO2
136	18#	ABC
137	18#	ABC
138	15#	CO2
139	18#	ABC
140	10#	ABC
141	10#	ABC
142	5#	ABC
143	20#	ABC
144	18#	ABC
145	18#	ABC
150	10#	CO2
151	18#	ABC
152	5#	CO2
153	5#	CO2
154	15#	CO2
155	17#	HALON
156	13#	HALON
157	17#	HALON
158	5#	CO2
159	5#	CO2
160	15#	CO2
165	18#	ABC
166	10#	ABC
167	18#	ABC
168	18#	ABC
	10#	ABC
169 170	10# 20#	ABC CO2

LOCATION	SIZE	TYPE
171	20#	BC
172	18#	ABC
173	125#	PK DCC
174	20#	ABC
175	20#	ABC
176	20#	ABC
180	17#	ABC DCC
181	18#	ABC
182	18#	ABC
183	10#	ABC
184	18#	ABC
185	10#	ABC
186	10#	ABC DCC
187	10#	ABC
188	25#	ABC DCC
189	15#	CO2
190	10#	ABC
191	10#	ABC DCP
192	10#	ABC
193	20#	CO2
198	18#	ABC
199	10#	ABC
200	10#	ABC
207	30#	BC
208	20#	ABC
225	25#	ABC DCC
226	25#	ABC DCC